

No. 5189 Equity

due notice appears to have been given as required by the annexed order misc.

Jno. Ritchie
John A. Lynch
Judges of the Circuit

No. 5100 Equity

Michael Kline, and Daniel M. Forrest
and Amanda C. Forrest, his wife
Plaintiffs

vs
Susan Forrest (widow) Susan Mahuda
Maugans and David Maugans, her husband;
Amia Forrest; William Forrest (an infant);
Esther Forrest (an infant) Jacob P. Swope
and Daniel M. Forrest, Trustees
Defendants

No. 5100 Equity -

In the Circuit
Court for Frederick
County

sitting

as

a

Court

of Equity -

Bill of
Complaint

To the Honorable the Judges, of said Court: - Your orator,
Michael Kline who sues, as well for himself, as for the other credi-
tors of Catharine Forrest, late of Frederick County, deceased, and Daniel
M. Forrest and Amanda C. Forrest his wife, complaining say: -

1. That a certain Samuel M. Forrest late of Frederick County was
in his life time seized and possessed of the following real estate,
situated in Frederick County, viz: - The "Home place" containing about
Sixty two and a quarter, acres of land, more or less, and which is
fully described in the two following deeds (1) a deed to the said
Samuel M. Forrest from Wilson Hays and wife dated the 15th day of
April in the year Eighteen Hundred and fifty - nine, and duly
and (2) a deed to the said Samuel M. Forrest from Peter Boyard
and wife dated on the 10th day of September in the year Eighteen
hundred and fifty - two for thirty five acres, and duly recorded,
certified copies of both of which deeds are herewith filed, as part of this
Bill, marked Exhibits Nos. 1 & 2 respectively -

2. That the said Samuel M. Forrest was also seized and possessed
of Fifteen Acres of mountain land, being part of a tract called
"Maddock's Inheritance" which he bought of Daniel M. Forrest Trustee
in No. 3520 Equity in the Circuit Court for Frederick County, and
described in said Trustee's report of sale as "Lot No. 11" as will appear
by a certified copy of his acknowledgment of purchase taken from the
record of proceedings in said cause, and herewith filed, as Exhibit No. 3.
The purchase money for which he fully paid to said Trustee, but
died before receiving a deed therefor. 3. That the said Daniel M.
Forrest Trustee as aforesaid sold 16 Acres 2 Rods, and 20
perches of land, more or less of said "Maddock's Inheritance"
"adjoining the aforesaid Lot No. 11" to a certain Jacob P. Swope,
as will appear by a certified copy of his acknowledgment of